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5 Attorneys for Creditor:
6 BSI Financial Services as servicer for U.S. Bank
Trust National Association, as trustee of the Igloo
Series III Trust
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10 UNITED STATES BANKRUPTCY COURT
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12 DISTRICT OF NEW JERSEY – CAMDEN DIVISION

13 In Re: HECTOR J. MERCADO) Case No.: 14-20604-ABA
14 Debtor.) CHAPTER 13
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TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL
INTERESTED PARTIES

PLEASE TAKE NOTICE that GHIDOTTI|BERGER, LLP, attorneys for US Trust
Bank National Association, as Trustee of the Igloo Series III Trust C/O BSI Financial Services
hereby requests special notice of all events relevant to the above referenced bankruptcy and
copies of all pleadings or documents filed in relation to the above referenced bankruptcy,
including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the
commencement of any adversary proceedings, the filing of any requests for hearing, objections,
and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which

1 must be noticed to creditors, creditors' committees and parties-in-interest and other notices as
2 required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-
3 referenced bankruptcy court.

4 GHIDOTTI|BERGER, LLP, requests that for all notice purposes and for inclusion in
5 the Master Mailing List in this case, the following address be used:

6 GHIDOTTI|BERGER, LLP
7 1920 Old Tustin Ave.
8 Santa Ana, CA 92705
Telephone (949) 427-2010 – Fax: (949) 427-2732
ecfnotifications@ghidottiberger.com

9 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
10 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
11 waiver of the within party's:

- 12 a. Right to have any and all final orders in any and all non-core matters entered
13 only after de novo review by a United States District Court Judge;
- 14 b. Right to trial by jury in any proceeding as to any and all matters so triable
15 herein, whether or not the same be designated legal or private rights, or in any case,
16 controversy or proceeding related hereto, notwithstanding the designation or not of such
17 matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial
18 right is pursuant to statute or the United States Constitution;
- 19 c. Right to have the reference of this matter withdrawn by the United States
20 District Court in any matter or proceeding subject to mandatory or discretionary withdrawal;
21 and
- 22 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
23 which this party is entitled under any agreements at law or in equity or under the United States
24 Constitution.

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1 All of the above rights are expressly reserved and preserved by this party without
2 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
3 or by any other participation in these matters.

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Dated: February 6, 2019

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GHIDOTTI|BERGER LLP.

By:/s/ Kristin A. Zilberstein

Kristin A. Zilberstein, Esq.

Attorneys for BSI Financial Services as servicer
for U.S. Bank Trust National Association, as
trustee of the Igloo Series III Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY – CAMDEN DIVISION**

In Re: HECTOR J. MERCADO) Case No.: 14-20604-ABA
))
) CHAPTER 13
))
) **CERTIFICATE OF SERVICE**
Debtors)

Debtors.

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen and not a party to the within action. My business address is: 1920 Old Tustin Avenue, Santa Ana, CA 92705.

I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

1 On February 6, 2019 I served the following documents described as:

2 • **REQUEST FOR SPECIAL NOTICE**

3 on the interested parties in this action by placing a true and correct copy thereof in a sealed
4 envelope addressed as follows:

5 (Via United States Mail)

| | |
|---|---|
| Debtor Hector J Mercado 28 N Vassar Square Ventnor, NJ 08406 | Chapter 13 Trustee Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002 |
| Debtor's Counsel Steven A. Silnutzer 335 E. Jimmie Leeds Road Building 200, Suite C Galloway, NJ 08205 | Chapter 13 Trustee's Counsel: Isabel C. Balboa (NA) Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38, Suite 580 Cherry Hill, NJ 08002 |
| | Donna L. Wenzel Office of Chapter 13 Trustee 535 Rt. 28 Suite 580 Cherry Hill, NJ 08002 |

18 xx____(By First Class Mail) At my business address, I placed such envelope for deposit with
the United States Postal Service by placing them for collection and mailing on that date
19 following ordinary business practices.

20 ____ Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the
Eastern District of California

22 xx____ (Federal) I declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct.

23 Executed on February 6, 2019 at Santa Ana, California

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25 */s/ LaKeha Green*
LaKeha Green